

Response deadline: November 22, 2006
4:00 p.m. EST
Hearing date and time: November 30, 2006
10:00 a.m. EST

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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|------------------------------|---|-------------------------|
| _____ |) | |
| In re |) | Chapter 11 |
| |) | |
| DELPHI CORP. <i>et al.</i> , |) | Case No. 05-44481 (RDD) |
| |) | |
| Debtors. |) | (Jointly Administered) |
| _____ |) | |

***RE-NOTICE OF MOTION OF J.T. BATTENBURG III, ALAN DAWES, PAUL FREE,
JOHN BLAHNIK, MILAN BELANS, CATHERINE ROZANSKI, PAMELA GELLER,
PETER JANAK AND LAURA MARION FOR LIMITED RELIEF FROM THE
AUTOMATIC STAY, TO THE EXTENT APPLICABLE, TO PAY AND/OR ADVANCE
DEFENSE COSTS UNDER THE DEBTORS' INSURANCE POLICIES***

PLEASE TAKE NOTICE that J.T. Battenburg, III, Alan Dawes, Paul Free, John Blahnik, Milan Belans, Catherine Rozanski, Pamela Geller, Peter Janak and Laura Marion (collectively, "Movants") have filed a motion (the "Motion") in the Bankruptcy Court, seeking limited relief from the automatic stay, to the extent applicable, to have Movants' defense costs paid and/or advanced under the Debtors' insurance policies.

PLEASE TAKE FURTHER NOTICE that a hearing (the "Hearing") will be held in connection with the entry of an Order granting the relief requested in Movants' Motion and any further relief, on **November 30, 2006, at 10:00 a.m., prevailing Eastern Time**, before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York (the "Court"), Alexander Hamilton Custom House, Room 610, One Bowling Green, New York, NY 10004.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to either of the Motions shall be in writing, shall state with particularity the reasons for the objection or response, and shall be filed with the Court and shall be served upon counsel for Movants as listed below, so as to be *received* by **November 22, 2006 at 4 p.m.** Only those objections which have been timely filed and served may be considered by the Court at the Hearing.

Dated: October 26, 2006

Respectfully submitted,

/s/ Richard A. Rossman

RICHARD A. ROSSMAN (*pro hac vice*)

MATTHEW J. LUND (*pro hac vice*)

Pepper Hamilton LLP

100 Renaissance Center, Suite 3600

Detroit, Michigan 48243

(313) 259-7110

Counsel for Paul Free

THOMAS W. CRANMER (*pro hac vice*)

Miller Canfield Paddock & Stone PLC

810 W. Long Lake Road, Suite 200

Troy, Michigan 48098

(248) 267-3381

Counsel for John Blahnik and Peter Janak

WILLIAM A. SANKBEIL (*pro hac vice pending*)

Kerr, Russell & Weber PLC

500 Woodward Avenue, Suite 2500

Detroit, Michigan 48226

(313) 961-0200

Co-Counsel for John Blahnik

MARTIN E. CRANDALL (*pro hac vice*)

Clark Hill PLC

500 Woodward Avenue, Suite 3500

Detroit, Michigan 48226

(313) 965-8413

Counsel for Milan Belans

CHRISTOPHER A. ANDREOFF (*pro hac vice* pending)
Jaffe, Raitt, Heuer & Weiss PC
27777 Franklin Road, Suite 2500
Southfield, Michigan 48034
(248) 351-3000
Counsel for Laura Marion

DAVID DUMOUCHEL (*pro hac vice*)
LAURIE J. MICHELSON (*pro hac vice*)
Butzel Long PC
150 W. Jefferson Avenue, Suite 100
Detroit, Michigan 48226
(313) 225-7004
Counsel for Cathy Rozanski

ROBERT M. STERN (RS3005)
O'Melveny & Myers LLP
1625 Eye Street, NW
Washington, D.C. 20006-4001
(202) 383-5300
Counsel for Alan Dawes

WILLIAM H. JEFFRESS, JR. (*pro hac vice* pending)
Baker Botts LLP
The Warner
1299 Pennsylvania Ave., NW
Washington, D.C. 20004-2400
(202) 639-7700
Counsel for J.T. Battenburg, III

ERIC R. WAPNICK (EW5419)
Stoneridge West
41000 Woodward Avenue
Bloomfield Hills, Michigan 48304
Counsel for Pam Geller

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